

California Native Plant Society

January 23, 2000

State of California
Department of Water Resources
Central District
3251 'S' Street
Sacramento, California 95816

RE: Yuba County Water Agency's Proposed Waldo Dam Project

To whom it may concern,

The Nevada and Placer County Chapter of the California Native Plant Society opposes the Waldo Dam proposal. At a time when resource agencies are beginning to understand the permanent, significant and unmitigable impacts of damming a stream to riparian and aquatic ecosystems, it is disturbing that the Department of Water Resources would consider a proposal to dam one of the few remaining tributaries in the region with no major dams or diversions and *to destroy the only large, contiguous public reserve of blue oak woodland in the Sierra Nevada.*

Thousands of citizens recognize the special qualities of the Spenceville Wildlife and Recreation Area (SWRA) and visit the area each year; hiking, bicycling, wildlife watching, horseback riding, hunting and many other recreational uses. Over 130 people turned out for a CNPS field trip 2 years ago to admire the extraordinary beauty of the oak woodlands and wildflowers found here. Citizen groups quickly organized in the threat of this dam proposal and created and funded the printing of a map and natural history of the area as an expression of their devotion to its protection. Field trip offerings and updates on the dam proposal appear in the newsletters of all conservation groups in the area. The Board of Supervisors of the County of Nevada has voiced their opposition to the Waldo Dam proposal. The Nature Conservancy and The Packard Foundation now recognize the significance of Dry Creek's link to several important natural community areas from the valley to the upper foothills and have pledged \$500,000 to acquire permanent protection for the Dry Creek corridor east of Spenceville.

Today, our oak woodlands, the icon of our state's natural heritage, are unprotected. Over 98% of the Sierra's remaining oak woodlands are in private ownership--- not in the public trust, according to an analysis of Sierran vegetation by U.C. Santa Barbara for the Sierra Nevada Ecosystem Project, A Report to Congress, 1996 (SNEP). Even more alarming is the finding that *"less than 1% of the foothill zone of the Sierra Nevada is in designated reserves or other areas managed primarily for biodiversity."* The Nature Conservancy found that Spenceville is the only large contiguous public reserve of blue oak woodland in the Sierra Nevada. Biodiversity management in the foothill zone is thus largely in the hands of private landholders as regulated by state and local governments. Loss of this precious and irreplaceable resource is unmitigable.



Dedicated to the preservation of California native flora



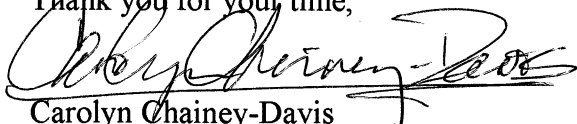
ecologically sensitive areas. The Important Natural Community Areas of Nevada County study (INCA), identified the most rare, endangered, threatened, unique and declining natural communities and species in the County using a methodology for biological scoping designed by The Nature Conservancy (TNC).

The INCA study identified 7 priority foothill streams and rivers for their biological richness, e.g., significant populations of important riparian communities, such as valley oak riparian forests, native amphibian, fish and wildlife species-of-concern and rare plants associated with stream corridors. The study also evaluated the landscape attributes of the County's streams and rivers as a measure of quality and viability and assigned scores based on both landscape attributes and biological richness. After completing this first phase of planning, the next step was to research ownership patterns, threats and management opportunities in order to assign top priorities for immediate conservation. Armed with a regional vision and a landscape-scale, science-based system for prioritization of conservation needs, the Dry Creek corridor was identified as a priority for protection. The destruction of the Spenceville reserve by the Waldo Dam proposal would destroy the biological integrity of the corridor and the significance of the LINC project of the Nature Conservancy, Packard Foundation, the Nevada County Land Trust and the Nevada County Conservation Alliance.

Dry Creek is a 25-mile stream that links the foothills with Spenceville SWRA, Beale AFB vernal pool preserve and the Bobelaine Ecological Reserve near Dry Creek's confluence with the Bear River and Feather River. This highest scoring foothill stream has no dams, only a few very small diversions, and contains good examples of valley oak riparian forest, mixed valley-foothill riparian forest, wetlands, high quality blue oak woodlands and extraordinary species diversity. Steelhead trout and chinook salmon are found migrating up to Spenceville, and it is home to many other native fish species such as the declining Pacific lamprey. Spenceville is home to a significant inland population of California black rail, a fully protected, state-threatened species, and populations of northwestern pond turtle, a federal species of concern. Foothill yellow-legged frogs are found in tributaries near Dry Creek and are expected to occur there as well. The corridor is used by migratory special status birds such as yellow-breasted chat and yellow warbler. River otters are common and Cooper's hawk, a species of concern, are found nesting in the oak woodlands adjacent to the corridor. Many of the other rivers and streams identified in the INCA study were found to be subdivided and ranchetted, unsuitable for continuous corridors. Dry Creek is an area of the County still owned by large family-owned ranches, an ideal framework for building sustainable corridors. Cultural resources are common all along the Dry Creek corridor. This project is part of a larger strategy to link important, and threatened, natural communities and species in the County with large public reserves to insure long-term viability of the resources and to protect movement corridors.

The Waldo Dam proposal will result in many significant, unmitigable environmental impacts and we urge the Department of Water Resources to withdraw their consideration of this project.

Thank you for your time,



Carolyn Chainey-Davis

President

California Native Plant Society

Nevada and Placer County Chapter



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Received 1/26/2000

B/60 Scoping Comments

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